

## **REMARKS**

### ***Summary of Amendments***

1. Claims 1-5 were originally presented in this application. Claims 2-5 were canceled and claim 6 added in Applicant's amendment, dated April 23, 2007, in reply to the first action on the merits. Claim 1 has been amended, further to the amendments to this claim made in the April 23 reply, for editorial clarity and to more particularly point out and distinctly claim the subject matter of the instant invention. Thus, claims 1 and 6 are pending before the Examiner.

### ***Claim Rejections – 35 U.S.C. § 102 & 103***

2. Claims 1 and 6 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Fukuda et al.* (Japanese Unexamined Pat. App. Pub. No. H10-237658, submitted to the Office in Applicant's IDS of November 1, 2006). In making this rejection, the Examiner states:

*Fukuda et al.* disclose a semiconductor processing device comprising a vertically movable pedestal, support pieces mounted to pedestal (abstract and Fig. 1), a hermetic bellows seal between pedestal and chamber (32) and lift pins to load/unload substrates (27). The lift pins are disclosed attached to the process chamber floor and do not move during load/unload. The bellows are outside the chamber.

3. Claims 1 and 6 stand rejected under 35 U.S.C. § 102(e) as being anticipated by, or in the alternative, under 35 U.S.C. § 103(a) as obvious over *Sang-Gee Park* (U.S. Pat. App. Pub. No. 2002/0174950). In making this rejection, the Examiner states:

*Sang-Gee Park* discloses a semiconductor processing device comprising a vertically movable pedestal, support pieces mounted to the pedestal (Fig. 4), a hermetic bellows seal between the pedestal and chamber (21), and lift pins to load/unload substrates (60). The lift pins are disclosed attached to the process chamber floor and do not move during load/unload. The bellows are outside the chamber. The lower ends of the lift pins could be screwed to a support fixed with respect to the chamber (61 and paragraph 33)

4. Claims 1 and 6 stand rejected under 35 U.S.C. § 102(b) as being anticipated by, or in the alternative, under 35 U.S.C. § 103(a) as obvious over *Benzing et al.* (U.S. Pat. No. 5,405,480). In making this rejection, the Examiner states:

*Benzing et al.* discloses a semiconductor processing device comprising a vertically movable pedestal, support pieces mounted to the pedestal (Fig. 1), a hermetic bellows seal between the pedestal and chamber (52), and lift pins to load/unload substrates (54, 56). The lift pins are disclosed fixed to the process chamber floor and do not move during load/unload.

Regarding claim 6, at least some part of the bellows [is] outside the chamber.

5. Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Brown et al.* (U.S. Pat. App. Pub. No. 2003/0029568). In making this rejection, the Examiner states:

*Brown et al.* disclose a semiconductor processing device comprising a vertically movable pedestal, support pieces mounted to pedestal (Fig. 2), a hermetic bellows seal between the pedestal and chamber (252), and lift pins to load/unload substrates (290). The lift pins are disclosed resting on a structure which is fixed to the process chamber and do not move during load/unload. . . . [Whether] they are anchored to the chamber [is not disclosed]. However, since they are fixed with respect to the chamber, they could obviously be anchored.

6. Applicant respectfully traverses these § 102 and § 103 rejections—the substance of which, as is evident from the above-cited passages, is essentially the same—to the extent that the rejections are pertinent to independent claim 1 as amended in the present paper. The amendment to claim 1 is supported, for example, by paragraph [0023] of the Image-File-Wrapper copy of the original specification. (No new matter has been added, and no new search should be required.)
7. Applicant respectfully submits that independent claim 1 now distinguishes patentably over the prior art of record. Claim 1, as amended, recites a semiconductor manufacturing device comprising: a processing chamber having an opening hermetically sealed by bellows and by a vertically movable pedestal; a wafer holder perforated by lift-pin through-holes; and lift pins anchored to the processing chamber in such a manner that an imaginary plane formed by the tip faces of their free ends has a planarity of 0.5 mm or less. Applicant respectfully submits that none of the prior art references teaches or suggests such a limitation, and therefore that the § 102 and § 103 rejections of independent claim 1 have been overcome.

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8. Applicant submits that amended independent claim 1 is allowable for the reasons set forth above. Claim 1 being allowable, it follows that dependent claim 6 must also be allowable.

Accordingly, Applicant courteously urges that this application is in condition for allowance. Reconsideration and withdrawal of the rejections is requested. Favorable action by the Examiner at an early date is solicited.

Respectfully submitted,

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